

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

KIERAN RAVI BHATTACHARYA,

Plaintiff,

v.

Civil Action No. 3:19-CV-00054

JAMES B. MURRAY, JR., *et al.*,

Defendants.

**NON-PARTY ANGEL HSU, M.D.'S
MOTION FOR COSTS AND REASONABLE ATTORNEY'S FEES**

Non-party Dr. Angel Hsu, M.D., (Dr. Hsu), by counsel, respectfully requests that the Court award her costs and reasonable attorney's fees associated with filing her Motion to Seal (ECF 507) necessitated by Plaintiff's cavalier treatment of her personal information and failure to file under seal his Motion to Compel (ECF 495) which contained sensitive personal and medical information regarding Dr. Hsu. Dr. Hsu requests that the Court:

1. Award Dr. Hsu her costs incurred throughout her involvement in this case, or at minimum, her costs incurred in bringing her Motion to Seal and this Motion for Costs and Fees;
2. Order Plaintiff to review his filings in this case and certify that no other documents containing Dr. Hsu's personal and confidential information have been filed or otherwise shared;
3. Order Plaintiff to re-file any documents filed in this matter which contain Dr. Hsu's personal and confidential information, either under seal or with appropriate redactions; and
4. Sanction Plaintiff for his failure to comply with the Protective Order entered in this case by publicly filing sensitive personal information.

As further grounds for this Motion, Dr. Hsu refers to the Memorandum in Support filed contemporaneously.

Dated: August 19, 2022

Respectfully submitted,

ANGEL HSU, MD

By: /s/ Stewart R. Pollock, Esq.
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Counsel for Angel Hsu, MD

CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and that a notice of electronic filing will be delivered via the CM/ECF system to all counsel of record.

/s/ Stewart R. Pollock, Esq.

Stewart R. Pollock

Counsel for Angel Hsu, M.D.